

Case 17-36538 Doc 28-2 Filed 04/17/19 Entered 04/17/19 15:30:31 Desc  
Statement Accompanying Relief From Stay Page 1 of 1  
**REQUIRED STATEMENT TO ACCOMPANY  
ALL MOTIONS TO MODIFY STAY**

All Cases: Debtor(s) Maritza Aburto Case No. 17-36538 Chapter 13

All Cases: Name of Moving Creditor VW CREDIT INC. Date Case Filed 12/8/17

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed 2/16/18

Chapter 7: No-Asset Report Filed on \_\_\_\_\_  
No-Asset Report not Filed, Date of Creditors Meeting \_\_\_\_\_

1. Collateral
  - a. Home \_\_\_\_\_
  - b. ☒ Car Year, Make and Model 2017 Volkswagen Jetta Sedan
  - c. Other \_\_\_\_\_
2. Balance Owed as of Petition Date \$15,667.89  
Total of all other Liens against Collateral \$ \_\_\_\_\_
3. In Chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral \$13,750.00
5. Default
  - a. Pre-Petition Default  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_
  - b. ☒ Post-Petition Default
    - i. ☒ On direct payments to the moving creditor  
Number of months 2.6 through 4/15/19 Amount \$1,438.57
    - ii. On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_
6. Other Allegations
  - a. Lack of Adequate Protection § 362 (d)(1)
    - i. No insurance
    - ii. Taxes unpaid Amount \$ \_\_\_\_\_
    - iii. Rapidly depreciating asset \_\_\_\_\_
    - iv. Other \_\_\_\_\_
  - b. No Equity and not Necessary for an Effective Reorganization § 362 (d)(2)
  - c. Other "Cause" § 362 (d)(1)
    - i. Bad Faith (describe) \_\_\_\_\_
    - ii. Multiple filings \_\_\_\_\_
    - iii. Other (describe) \_\_\_\_\_
  - d. Debtor's Statement of Intention regarding the Collateral
    - i. Reaffirm
    - ii. Redeem
    - iii. Surrender
    - iv. No Statement of Intention Filed

Date: 4/17/19

/s/ Terri M. Long  
Counsel for Movant